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March 14, 2025

The Honorable John M. Younge, Judge
U.S. District Court for the Eastern District of Pennsylvania
Room 15613 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

VIA ECF FILING and
VIA EMAIL: Chambers_Younge@paed.uscourts.gov

**Re: American Environmental Enterprises, Inc. d/b/a TheSafetyHouse.Com v.
Manfred Sternberg et als
USDC, ED PA, Civil No. 2022-cv-00688 (JMY)**

Dear Judge Younge:

We represent plaintiff American Environmental Enterprises, Inc. d/b/a THE SAFETY HOUSE.COM in the above-referenced case. We join in the request made by Seth Laver, Esquire, counsel for the Sternberg defendants, in his letter to the Court dated March 10, 2025, that the Final Pre-Trial Conference scheduled for April 1, 2025, instead be turned into a case management conference. Daniel Scully, the principal of plaintiff, and our main contact (and witness) in this case, continues to make regular visits to the hospital, and is undergoing daily treatment following the multiple surgeries he had in January, and he continues to need additional time to recover from his health issues. We also concur with counsel for the Sternberg defendants that the Court's disposition of the pending motions [ECF nos. 184, 190, 196, 197, and 198-201] will greatly aid all parties as respects potential pre-trial submissions.

Thank you for Your Honor's consideration.

Respectfully,

Gary Lightman
/s/ Gary Lightman _____
Gary P. Lightman

GPL:no

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cc: Seth Laver, Esquire (slaver@goldbergsegalla.com)
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